

LAW OFFICES

CHASAN LEYNER & LAMPARELLO

A PROFESSIONAL CORPORATION

300 HARMON MEADOW BOULEVARD
SECAUCUS, NEW JERSEY 07094-3621
TEL. (201) 348-6000
FAX (201) 348-6633
WWW.CHASANLAW.COM

COUNSEL
JOEL A. LEYNER^{Δ*}
ARTHUR N. D'ITALIA

OF COUNSEL
HERBERT KLITZNER
JOSEPH M. ANDRESINI
ROBERT M. CZECH
MICHAEL A. D'ANTON, PH.D.[▽]

RAYMOND CHASAN
(1904-1988)

Discovery is stayed until November 2, 2009.

October 2, 2009

So Ordered this 9th day
of October, 2009

By ECF

Honorable Lois H. Goodman, U.S.M.J.
Clarkson S. Fisher Federal Building
402 East State Street, Room 6052
Trenton, New Jersey 08608

Re: Torres-Hernandez and Ramirez v. CVT Prepaid Solutions
Docket No. 3:08-cv-1057-FLW-TJB
File No. 13499-1837

Dear Judge Goodman:

Together with the law firm of Shesky & Froelich Ltd., we represent the defendant CVT Prepaid Solutions, Inc. (CVT). During an August 28, 2009 status conference we advised the Court and counsel of CVT's intention to file a petition for voluntary bankruptcy under Chapter 7 of the United States Bankruptcy Code. In an Order memorializing that conference, the Court directed CVT to provide a status report which we now do.

I am informed by co-counsel Bart O'Brien, Esq. of Shesky & Froelich that: CVT is working with separate bankruptcy counsel to prepare the necessary documents and schedules required to support the petition; filing of the bankruptcy petition is complicated and delayed by the recent decision to file separate Chapter 7 bankruptcies for two wholly-owned CVT subsidiaries; and, the filing of these bankruptcies will occur at the same time as CVT files its bankruptcy petition.

Under these circumstances, CVT requests that this Court continue to stay discovery pending further order of the Court and proposes providing the Court with a status report on or before November 2, 2009.

RALPH J. LAMPARELLO^{Δ**○}
ROBERT A. KAYE^Δ
CINDY NAN VOGELMAN
JOHN V. MALLON^{○*}
STEVEN L. MENAKER⁺⁺
THOMAS R. KOBINA
ROBERT A. CAPPUZZO^Δ
JOHN L. SHAHDANIAN II^Δ
ANTHONY V. D'ELIA
MITZY GALIS-MENENDEZ
PATRICK J. ARRE^{**○}
JOHN P. BEIRNE
MICHAEL D. WITT[⊖]

KIM R. ONSDORFF[○]
JORDAN S. FRIEDMAN^Δ
THOMAS A. MORRONE^{*}
ANN M. MERRITT[⊖]
PETER L. MACISAAC
NICOLE R. CASSATA
MICHAEL A. CASSATA
JOSEPH A. GARCIA^Δ
MARK S. HANNA^Δ
JOSE VILARIÑO
ROOSEVELT JEAN
KIRSTIN BOHNA
JOSEPH A. LAGANA
JOHN M. TUNTEVSKIA
RICHARD W. FOGARTY^Δ
MARIA P. VALLEJO
RAYMOND J. SEIGLER
ROBERT E. FINNA
JOSEPH CATENARO

Δ N.J. & N.Y. BARS
○ N.J. & PA. BARS
▽ N.J. & D.C. BARS
⊖ N.J., N.M. & KS. BARS
⊖ N.J. & FL. BARS

* CERTIFIED CIVIL TRIAL ATTORNEY
+ CERTIFIED CRIMINAL TRIAL ATTORNEY
○ RULE 1:40 QUALIFIED MEDIATOR

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We thank you for your consideration and await your advice.

Respectfully yours,

/s/ Steven Menaker

Steven Menaker
For the Firm

SM:mr

c: All counsel of record by ECF